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*ADMITTED IN NY & CT

April 29, 2022 (VIA ECF)

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the Southern District of New York
Thurgood Marshall U.S. Courthouse, 40 Foley Square
New York, NY 10007

**Re: *In re Terrorist Attacks on September 11, 2001*, 03-MD-1570 (GBD)(SN)
Ahearn v. Islamic Republic of Iran, 20-cv-0355 (GBD)(SN)
Alcibes v. Islamic Republic of Iran, 20-cv-0340 (GBD)(SN)
Amin v. Islamic Republic of Iran, 20-cv-0412 (GBD)(SN)
Anderson v. Islamic Republic of Iran, 20-cv-0354 (GBD)(SN)
Asciutto v. Islamic Republic of Iran, 20-cv-0411 (GBD)(SN)
Basci v. Islamic Republic of Iran, 20-cv-0415 (GBD)(SN)
Mandelkow v. Islamic Republic of Iran, 20-cv-0315 (GBD)(SN)**

Dear Magistrate Judge Netburn:

On behalf of the Plaintiffs in the above-referenced cases ("Plaintiffs"), we write to request an order granting Plaintiffs an additional 90 days to complete the submission of evidence of the Plaintiffs' pain and suffering resulting from the September 11 terrorist attacks.

On January 14, 2022, in response to the Court's January 5, 2022 Order regarding Plaintiffs' pending motions for default judgment, Plaintiffs requested 120 days to submit additional evidence that will provide greater context to the pain and suffering endured by each victim, and will demonstrate why applying the Court's baseline compensatory amounts and framework is appropriate for these victims. ECF No. 7601. The Court granted Plaintiffs' request on January 18, 2022. ECF No 7611.

Plaintiffs' Counsel has been diligently gathering evidence from each Plaintiff for submission to the Court. Due to the substantial number of victims across the subject cases and the emotional nature of the testimony and evidence, Plaintiffs respectfully submit that additional time is required to complete the submission of evidence for all Plaintiffs in these cases.

Accordingly, Plaintiffs request an additional 90 days to submit their supplemental evidence. In an effort to promote a more efficient review process, and unless otherwise ordered by the Court, Counsel is prepared to submit the evidence for each of the individual cases on a rolling basis

with an accompanying renewed motion for default judgment as the evidence for each case is completed and ready for review.

Respectfully,

A handwritten signature in cursive script, appearing to read "Barry Salzman", written in dark ink.

Barry Salzman

cc: All counsel via ECF